

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

Racing Speed Associates, L.L.C.)	
d/b/a ASA Racing,)	
)	Case No. 07 C 6785
Plaintiff,)	
v.)	Judge Kennelly
)	
Louis R. Varney, Jr. and)	
ASA Late Model Series, L.L.C.,)	
)	
Defendants.)	

**DEFENDANTS' UNOPPOSED MOTION FOR A ONE WEEK EXTENSION OF TIME
TO RESPOND TO PLAINTIFF'S FIRST AMENDED COMPLAINT**

Defendants move this Court for a one week extension of time to respond to plaintiff's First Amended Complaint, until May 9, 2008. In support of their motion defendants state:

1. On April 11, 2008, plaintiff filed a motion for leave to amend its complaint to add an additional claim.

2. On April 17, 2008, the motion was heard and defendants did not object.

3. On April 18, 2008, defendants were served with a First Amended Complaint.

Under Rule 15(a), the response is due 10 days from the service date, which is May 2, 2008.

4. Due to out of town commitments of primary counsel, defendants seek a one week extension, to May 9, 2008, to answer the First Amended Complaint.

5. On April 29, 2008, defense counsel contacted plaintiff's counsel by e-mail and was advised that plaintiff does not object to this extension.

ACCORDINGLY, defendants respectfully request that this Court grant their unopposed motion for a one week extension of time to respond to plaintiff's First Amended Complaint, until May 9, 2008.

Respectfully submitted,

LOUIS R. VARNEY JR. and
ASA LATE MODEL SERIES, L.L.C.

/s/ Johanna J. Raimond

One of their attorneys

Wm. Christopher Penwell
Siegel Brill Greupner Duffy & Foster P.A.
1300 Washington Square
100 Washington Avenue South
Minneapolis, MN 55402
612/337-6104

Johanna J. Raimond
Law Offices of Johanna J. Raimond Ltd.
321 S. Plymouth Court
Suite 1515
Chicago, IL 60604
312/235-6959

Attorneys for Defendants

CERTIFICATE OF SERVICE

On April 30, 2008, undersigned Counsel certifies that the attached DEFENDANTS' UNOPPOSED MOTION FOR A ONE WEEK EXTENSION OF TIME TO RESPOND TO PLAINTIFF'S FIRST AMENDED COMPLAINT was served through the Court's ECF e-filing system on the following:

William L. Niro
NIRO, SCAVONE, HALLER AND NIRO
181 West Madison Street
Suite 4600
Chicago, Illinois 60602

/s/ Johanna J. Raimond